

1 KEN THERRIEN  
2 413 NORTH SECOND STREET  
3 YAKIMA, WA 98901  
4 (509) 457-5991

5 **Attorney for Defendant**

6 MIGUEL REYES GARCIA

7 **IN THE UNITED STATES DISTRICT COURT**  
8 **FOR THE EASTERN DISTRICT OF WASHINGTON**  
9 **(Honorable Edward F. Shea)**

10 UNITED STATES OF AMERICA, )  
11 vs. Plaintiff, ) CR-15-6049-EFS-21  
12 MIGUEL REYES GARCIA, ) DEFENDANT JOINT AND  
13 Defendant. ) PROPOSED JURY  
14 ) INSTRUCTIONS  
15 \_\_\_\_\_ )

16 The Defendant, Miguel Reyes Garcia, joins in the Proposed Jury  
17 Instructions, 3.4, 3.5, 3.7, 3.9, 3.10. of Defendant Herrera Farias. The  
18 defendant, also joins in with the Governments' proposed instructions to the  
19 extent they apply to the charges in Count 1 of the Second Superseding  
20 Indictment and do not conflict with the jury instructions previously agreed  
21 to in Mr. Herrera Farias' instruction. The defendant files his Proposed Jury  
22 Instruction 8.22: Multiple Conspiracy. The defendant respectfully requests  
23 leave to supplement his proposed jury instructions with permission of the  
24 Court.

25  
26 DEFENDANT JOINT AND PROPOSED  
27 JURY INSTRUCTIONS - 1

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1 RESPECTFULLY submitted this 1<sup>st</sup> day of October, 2018.  
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3

4 *s/Ken Therrien*  
5 KEN THERRIEN, WSBA #20291  
6 Attorney for Miguel Reyes Garcia  
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## **CERTIFICATE OF SERVICE**

10 I hereby certify under penalty of perjury of the laws of the State of Washington  
11 that on October 1, 2018, I electronically filed the foregoing with the Clerk of  
12 the Court using the CM/ECF System which will send notification of such  
13 filing to the following: Stephanie Van Marter, Assistant United States  
14 Attorney.  
15  
16

17 *s/ Ken Therrien*  
18 KEN THERRIEN, WSBA #20291  
19 Attorney for Miguel Reyes-Garcia  
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DEFENDANT JOINT AND PROPOSED  
JURY INSTRUCTIONS - 2

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You must decide whether the conspiracy charged in the indictment existed, and, if it did, who at least some of its members were. If you find that the conspiracy charged did not exist, then you must return a not guilty verdict, even though you may find that some other conspiracy existed. Similarly, if you find that any defendant was not a member of the charged conspiracy, then you must find that defendant not guilty, even though that defendant may have been a member of some other conspiracy.